

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

INA STEINER, et al.,

Plaintiffs,

V.

EBAY INC., et al.,

Defendants.

Civil Action No. 21-CV-11181-PBS

**DECLARATION OF JESSE R. COULON, ESQ. IN SUPPORT OF DEFENDANT  
WENDY JONES’S REPLY BRIEF IN FURTHER SUPPORT OF HER MOTION FOR  
SUMMARY JUDGMENT**

I, Jesse R. Coulon, hereby state and depose as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and I am admitted to the Bar of this Court.
2. I am an attorney at the law firm of Ropes & Gray LLP, counsel to Defendant (Wendy Jones) in the above-captioned matter.
3. I have personal knowledge of the facts stated in this declaration and, if called to testify, would competently testify thereto.
4. Exhibit 55 is a true and correct copy of Plaintiff's Further Amended Notice of Deposition to Defendant eBay Inc., Pursuant to FRCP 30(b)(6).
5. Exhibit 56 is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of eBay Inc. (by its representative Anagha Apte) dated September 17, 2024.
6. Exhibit 57 is a true and correct copy of Jim Baugh's eBay position change history with Bates number EBAY STEINER 00002535.

7. Exhibit 58 is a true and correct copy of a text exchange dated August 1, 2019 between Mr. Wenig and Mr. Wymer with the Bates number WYMER00000277.
8. Exhibit 59 is a true and correct copy of a text exchange between Mr. Wymer and Mr. Baugh with the Bates number WYMER00000205.
9. Exhibit 60 is a true and correct copy of excerpts from the transcript of the deposition of Veronica Zea taken September 11, 2024.
10. Exhibit 61 is a true and correct copy of excerpts from the transcript of the deposition of Anneli Olausson taken September 18, 2024.
11. Exhibit 62 is a true and correct copy of excerpts from the transcript of the deposition of Carmen Amara taken September 25, 2024.
12. Exhibit 63 is a true and correct copy of excerpts from the transcript of the deposition of Daniel Cory taken September 6, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2025, in Boston, Massachusetts.

*/s/ Jesse R. Coulon*

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Jesse R. Coulon (BBO# 705248)

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*Counsel for Wendy Jones*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 14, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Date: February 14, 2025

/s/ Jesse R. Coulon

Jesse R. Coulon